FILED BY . 29 O.C.
IN THE UNITED STATES DISTRICT COURT
05.0CT 27 PH QR 3 HE WESTERN DISTRICT OF TENNESSEE

FILED EN AND

2005 OCT 27 AM 9: 12

THOMAS M. GOULD
UNITERX STEATES OF UNITERICA,

Plaintiff,

VS.

ALAN BRAVERMAN,

Defendant.

NO. 2:04CR20366-MI

CIOS DENJED

J. 27 2005

DATE

## MOTION TO EXTEND TIME FOR SURRENDER

Your defendant thorough his undersigned attorney respectfully moves the Court to grant an extension of time to a date that the Court deems appropriate to surrender to the designated prison and in support thereof would show unto the Court the following reasons to-wit:

- 1. That the defendant has previously filed a Motion for Release pending an appeal and that the government has filed a response to the said Motion opposing the defendant's Motion to be Released Pending Appeal. The defendant filed a response to the government's response on Monday, October 24, 2005.
- 2. The defendant has been advised by the case coordinator of this Court that as of this date the Court, the Court has received all motions filed by both the defendant and the government and has not ruled on the defendant's motion.
- 3. Your defendant would further show that since the surrender date is scheduled for October 28, 2005, that an order extending such period of time would be appropriate.



Respectfully Submitted,

BRETT B. STEIN

ATTORNEY AT LAW 100 N. MAIN, #1921 MEMPHIS, TN 38103

(901) 521-0084

## CERTIFICATE OF SERVICE

I, Brett B. Stein, do hereby certify that a copy of the foregoing Motion has been hand delivered to the U.S. Attorney on this 27 day of 2005.

Brett B. Stein



## **Notice of Distribution**

This notice confirms a copy of the document docketed as number 66 in case 2:04-CR-20366 was distributed by fax, mail, or direct printing on October 28, 2005 to the parties listed.

Carroll L. Andre U.S. ATTORNEY'S OFFICE 167 N. Main St. Ste. 800 Memphis, TN 38103

Brett B. Stein FINLEY & STEIN 236 Adams Avenue Memphis, TN 38103

Honorable Jon McCalla US DISTRICT COURT